

To: Lorang, Phil[Lorang.Phil@epa.gov]
Cc: Werner, Christopher[Werner.Christopher@epa.gov]; Keas, Ashley[keas.ashley@epa.gov]
From: Beaver, Melinda
Sent: Wed 5/31/2017 1:30:42 PM
Subject: RE: BART-Affected Units for IPM version 6
State of Wyoming vs EPA.pdf

Thanks Phil.

- I changed Corette/Colstrip SO2 and NOx and Coal Creek NOx to “remanded and vacated”
- To the TX entries, I added “judicially stayed” to the statement that we requested and received a voluntary remand.
- To Laramie River Station 1-3, Dave Johnston 3, and Wyodak 1 I added “10th Circuit stayed the NOx limit; judicial proceedings also stayed pending settlement”; I attached the decision that stayed the Wyoming limits.

One more question:

- In Colorado, where we requested a voluntary remand, was that also with vacatur? I’m guessing no, but I don’t know how to check this (besides asking OGC). CAMD’s table has a compliance date of 2021, which I don’t think is official yet because we haven’t approved the SIP revision.

From: Lorang, Phil
Sent: Tuesday, May 30, 2017 5:43 PM
To: Beaver, Melinda <Beaver.Melinda@epa.gov>
Cc: Werner, Christopher <Werner.Christopher@epa.gov>; Keas, Ashley <keas.ashley@epa.gov>
Subject: RE: BART-Affected Units for IPM version 6

I think CAMD might need more complete information on whether each remanded emission limit was vacated or not.

I think it would also matter to CAMD that the TX RP FIP emission limits are all judicially

stayed, such that they can't take effect without further court action. The same is true for Wyoming (right?).

I can't think of any final actions you've missed.

From: Beaver, Melinda
Sent: Tuesday, May 30, 2017 12:54 PM
To: Lorang, Phil <Lorang.Phil@epa.gov>
Cc: Werner, Christopher <Werner.Christopher@epa.gov>; Keas, Ashley <keas.ashley@epa.gov>
Subject: FW: BART-Affected Units for IPM version 6

Hi Phil,

Do you have time to check my approach (or actual work) on the attached? This spreadsheet lists the RH inputs to IPM that CAMD asks us to update each year. My method was to search your FR spreadsheet for recent actions (i.e., that we took from 2015-2017). Then, I updated the spreadsheet if the "recent" action changed the emission limit or compliance date. The notable updates were Arkansas and Arizona (Cholla, Coronado FIP revision, and Apache) EGUs.

I asked CAMD how to handle remanded limits, and CAMD said to note them but only remove them if vacated, so I left the TX RP controls on the list, but noted the action is remanded.

Items I didn't capture:

- WY settlement agreement
- Navajo FIP (because they list the units as inactive)
- Proposals for NY, TX BART, LA EGU BART, Coronado SIP revision

Sound logical? Can you think of other recent activities that should've been updated?

Thanks,
Melinda

From: Fisher, Brian
Sent: Tuesday, May 30, 2017 2:30 PM
To: Beaver, Melinda <Beaver.Melinda@epa.gov>
Subject: RE: BART-Affected Units for IPM version 6

I think I would list them, and mark them as remanded if possible. Not sure what we would do, but I think previous practice has been to keep remanded items in place if they are not vacated, until the replacement is complete.

From: Beaver, Melinda
Sent: Tuesday, May 30, 2017 2:19 PM
To: Fisher, Brian <Fisher.Brian@epa.gov>
Subject: RE: BART-Affected Units for IPM version 6

One more question – for actions that have been remanded, but not vacated, should I list those limits? This is a pretty big decision because one action requiring SO2 limits on several TX sources is remanded to us, but not vacated. It was a voluntary remand, not sure that matters or not...

From: Fisher, Brian
Sent: Tuesday, May 30, 2017 10:54 AM
To: Beaver, Melinda <Beaver.Melinda@epa.gov>
Subject: RE: BART-Affected Units for IPM version 6

Great, thanks.

Yes, the last column just means IPM considers the unit as no longer operable. Because we don't model these units in our forward looking projections, we don't need any information on them.

From: Beaver, Melinda
Sent: Tuesday, May 30, 2017 10:52 AM
To: Fisher, Brian <Fisher.Brian@epa.gov>
Subject: RE: BART-Affected Units for IPM version 6

Hi Brian,

I've actually been working on this this morning. So far I have some changes for Arizona and Arkansas EGUs. One question, if the last column is marked 'Not in NEEDS 6.17_Active', does that just mean IPM considers the units shutdown? Do you need information on when the shutdown was enforceable?

Melinda

From: Fisher, Brian
Sent: Tuesday, May 30, 2017 10:39 AM
To: Beaver, Melinda <Beaver.Melinda@epa.gov>
Subject: RE: BART-Affected Units for IPM version 6

Hi Melinda,

I wanted to check in and see whether you had any thoughts on the inventory of BART units? We are hoping to share the updated list with our contractor this week.

Thanks again,

From: Victor, Meg
Sent: Wednesday, May 17, 2017 2:38 PM
To: Beaver, Melinda <Beaver.Melinda@epa.gov>
Cc: Fisher, Brian <Fisher.Brian@epa.gov>
Subject: RE: BART-Affected Units for IPM version 6

Hi Melinda,

Great, thanks. I'm starting a detail in OPPT this Monday May 22; Brian will be point person in CAMD on this going forward.

Best,
Meg

Meg Victor

Clean Air Markets Division

(202) 343-9193

From: Beaver, Melinda
Sent: Wednesday, May 17, 2017 12:24 PM
To: Victor, Meg <Victor.Meg@epa.gov>
Cc: Fisher, Brian <Fisher.Brian@epa.gov>
Subject: RE: BART-Affected Units for IPM version 6

Hi Meg,

I got your voicemail. I have seen the email and reviewing the spreadsheet is on my to-do list. I don't have any questions at this point.

Thanks,

Melinda

From: Victor, Meg
Sent: Tuesday, May 09, 2017 4:36 PM
To: Beaver, Melinda <Beaver.Melinda@epa.gov>
Cc: Fisher, Brian <Fisher.Brian@epa.gov>
Subject: BART-Affected Units for IPM version 6

Hi Melinda,

As discussed, I'm sending the attached spreadsheet file with BART units. My understanding is that OAQPS (maybe Martha Keating?) provided the spreadsheet in this format for the last IPM platform update, which was in 2013.

Starting with that 2013 spreadsheet, our contractor at ICF recently updated it to reflect new information obtained since 2013, e.g., if we received comments about BART implementation for particular units. ICF also added the last column ("H"), which identifies whether the unit is included in the new draft NEEDS for version 6. If the unit is ***not*** in the new NEEDS, then we don't need to update BART requirements for the unit.

For the units that are in the new NEEDS, can you confirm/update the BART requirements? E.g., is a unit subject to source-specific BART and are the limits correct, or is the unit in a state that chose to adopt CSAPR in its RH SIP, or subject to a RH FIP that adopts CSAPR? The file lists the BART compliance dates for each unit, it would be great if those dates can be checked/updated. The first run-year for IPM version 6 will be 2021.

I'm copying Brian Fisher on this email. Brian is going to take over as point person in CAMD for BART implementation in IPM version 6 within the next week or two.

Many thanks,
Meg

Meg Victor

Clean Air Markets Division

(202) 343-9193

From: Venkatesh, Boddu [<mailto:Boddu.Venkatesh@icf.com>]
Sent: Tuesday, May 09, 2017 3:45 PM
To: Victor, Meg <Victor.Meg@epa.gov>
Cc: Li, Hao <Hao.Li@icf.com>
Subject: BART Affected Units

Meg:

The list of BART affected units is attached.

Thanks,

Venkatesh